

MASSACHUSETTS DIVISION OF EMPLOYMENT AND TRAINING

In the Matter of: HOWARD E. RICHARDSON,  
Claimant

Docket No. 339843

**AFFIDAVIT OF JOSEPH CAMMARATA**

I, Joseph Cammarata, do hereby depose and state as follows:

1. I was the manager of Storage USA in Haverhill, Massachusetts on April 20, 2002.
2. My hours were traditionally 9:00 AM to 6:00 PM Monday through Friday, Saturday 9:00 AM to 5:00 PM and Sunday 9:00 AM to 2:00 PM.
3. On the Saturday of April 20, 2002, I had a personal family situation that prevented me from working on that day. This was communicated to upper management who assured me they would provide coverage. They informed me they were sending a Manager and an Assistant Manager from Waltham to cover for April 20<sup>th</sup>.
4. They informed me to give them the keys on Saturday, April 20<sup>th</sup>. I contacted Howard Richardson and asked him if he would do me a favor and drop a set of keys off to the Manager or Assistant Manager on Saturday.
5. Howard Richardson was not scheduled to work on Saturday, April 20<sup>th</sup> as he was not a Supervisor. His hours were Monday through Friday. He would occasionally work weekends if asked, but would be paid an overtime rate, as he was maintenance/janitorial.
6. Mr. Richardson had told me he was going on a day trip on April 20<sup>th</sup> and in no way could Storage USA reasonably believed he was scheduled to work.
7. Mr. Richardson while employed at Storage USA never had a problem with attendance or punctuality and was an extremely hardworking individual.
8. Any statements made that suggest Mr. Richardson was responsible for coverage on April 20, 2002 are blatantly false.
9. I will testify to the above but am unable to do so today because of my work schedule.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY

Dated: December 18, 2002

Joseph Cammarata  
Joseph Cammarata

COMMONWEALTH OF MASSACHUSETTS

Essex, ss.

December 18, 2002

Then personally appeared the above-named Joseph Cammarata, and acknowledged the foregoing to be his free act and deed,

Before me, Joanne M. MacRister  
Notary Public  
My Commission Expires: 9/2 07